

GLASS and the SCIP Database

July 2021

1) Background

The Waste Framework Directive foresees in its article 9 the setting up of a database grouping information on Substances of Concern in Articles as such or in complex objects (Products) with legal reference to Article 33 of the REACH regulation. This database, known as the SCIP database, is maintained by the European Chemicals Agency (ECHA).

The SCIP database aims to ensure that information on articles containing candidate list substances is publicly available throughout the life cycle of products and materials, including disposal. Companies supplying to the EU market articles which contain candidate list substances of very high concern (SVHC) in concentrations above 0.1% are required to submit information on these articles to ECHA as from 5 January 2021. The addressees are in particular waste management companies and consumers.

2) What about articles made of glass substances?

Glass producers are sometimes using SVHC substances as starting materials for the synthesis of one other substance (glass) and the production of glass articles thereof.

Such substances are not present as such in the final glass article. In fact, although conventionally the chemical composition of glass is expressed under the form of weight percentages of the oxides of the constituent elements, in reality glass is not a mixture of different oxides: starting from the raw materials, the melting process produces a completely new substance, glass, where all the constituent elements become part of the amorphous network with general chemical formula $Si_mNa_nCa_oAl_p.....O_s$ [glass]¹.

The physico-chemical properties of the substance glass (chemical resistance, mechanical resistance, transmittance, colour, etc.) are a function of the network formed. Different compositions lead to different glass chemical structures and consequently to different physico-chemical properties of the final material.

Glass articles are therefore made of the substance glass and do no longer contain the starting substances as such.

¹ <https://www.glassallianceeurope.eu/en/reach>

As the pure substance glass is not listed on the candidate list as SVHC substance, there is no downstream user information duty according to REACH, Art 33, neither for the substance glass itself, nor for articles made thereof – as long as potentially added further substances do not fulfil the respective requirements.

Consequently, there is no obligation for articles made of glass to provide information in the SCIP database.

In case of complex articles made of glass and other parts, it is the responsibility of the individual glass manufacturers to assess whether information obligations and possible notification are necessary.

3) ECHA's position on glass articles in relation to the SCIP database

ECHA specifically addresses the case of glass substances in a presentation on its website, entitled "Key tips for successful SCIP notifications" (December 2020, v. 1.0)².

The SCIP notification only applies to articles containing SVHCs on the Candidate List.



For example: Boron (e.g. diborontrioxide, boric acid and disodium tetraborate) and lead (e.g. lead oxide) substances in the Candidate List used in the production of a glass article may not be present as such in that final glass article. In such cases, there is no obligation to submit a SCIP notification for that article, nor to communicate information down the supply chain under Art. 33 of REACH

This ECHA statement is a clear indication that lead crystal glass and borosilicate glass articles / parts of articles do not qualify for notification in the SCIP list.

Of course, ECHA cannot substitute itself to the duties of the manufacturers in assessing whether an article contains a SVHC. This is why ECHA routinely reminds that it is the task of the respective company to prove that a substance from the candidate list has been completely consumed in the production of the glass matrix and is no longer present in the final product.

² https://echa.europa.eu/documents/10162/28213971/key_tips_for_successful_scip_notification_en.pdf/, slide14 on next page

Annex: Slide 14 of the ECHA presentation:



Only submit notifications for articles containing SVHCs on the Candidate List

- **The SCIP notification only applies to articles containing SVHCs on the Candidate List.**
 - For example: Boron (e.g. diboron trioxide, boric acid and disodium tetraborate) and lead (e.g. lead oxide) substances in the Candidate List used in the production of a **glass article** may not be present as such in that final glass article. In such cases, there is no obligation to submit a SCIP notification for that article, nor to communicate information down the supply chain under Art. 33 of REACH.
 - It remains the responsibility of companies to assess for their specific use of the Candidate List boron and lead substances whether these are completely transformed into glass in the manufacture of the glass substance and are not present as such in the final glass article.

We invite you to consult the Q&A [1218](#) (*Do I need to notify and communicate information down the supply chain for certain boron substances included in the Candidate List, which are involved in the production of boron glass articles but not present as such in these articles?*) which has been developed when certain boron substances are involved in the production of boron glass articles. Similarly to the case covered by that Q&A, certain lead substances (e.g. lead oxide) included in the Candidate List may be involved in processes leading to the production of articles containing a 'glass' substance. In these processes, the lead substances may be first chemically transformed into a manufactured glass substance. The glass substance is subsequently processed into articles. In many cases, the lead substances are completely transformed and are not present as such in the final glass article.

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About Glass Alliance Europe

Glass Alliance Europe is the European Alliance of Glass Industries. It is composed of 14 national glass associations and of the 5 main sectors of the glass industries: container glass, flat glass, special glass, domestic glass and continuous filament glass fibres. Over Europe, glass-makers employ directly around 200.000 people.

Glass industries invest in research, develop and manufacture glass products fit for a sustainable, resource-efficient and low-carbon society such as energy-efficient windows, fully recyclable bottles and jars, weight-lightening continuous glass fibres, glass for photovoltaic modules, etc. Glass industries continuously invest in upgrading manufacturing installations to minimize the carbon content of products and increase their recycling.